

To: Linden, melissa[linden.melissa@epa.gov]
From: Ex. 6 - Personal Privacy
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Subject: FW: Update

Water pumping operations continued in the containment area of the tanks storing the pumped water, in all of the sumps inside the containment area surrounding the MCHM tanks, in the intercept trench, and in the loading dock area, which leads to the oil/water separator. EPA noticed that the area at the loading dock that leads to the oil/water separator seemed to be filling and overflowing with water and was not being pumped as often as it should. These concerns were shared with the WVDEP, who notified the contractor and asked them to keep up with the water build-up in that area. With the increase in temperatures, the interceptor trench is now pumped out once per hour. The facility monitors the trench 24-hours a day.

The contractor began excavation in the ditch along Barlow Road. The higher areas of the ditch were scraped in order to create a slope that leads towards the drainage culvert. However, water pooled in the northern area of the ditch, and deeper excavation would not facilitate flow through the culvert. Therefore, a combination of clay/soils will be placed into the northern end of the ditch in order to raise the elevation to facilitate water drainage in a southerly direction, away from the facility. When work resumes in the area, a silt fence will be installed and the area will be re-graded.

The change in the OSRO contractors yesterday was completed. A portion of the river boom remained in place, as the new contractor purchased the boom from the former contractor. Therefore, the facility was not left with no boom in the river at the base of the slope at any time. As a precaution, WVDEP contacted WVAVC to inform them of the boom operations. No release of MCHM was noted.

The facility continued to load the remaining marketable product into tanker trucks for transport off-site and expects that all product at Freedom Industries will be off site by next week, ahead of the WVDEP ordered date of March 15, 2014. The facility received an order for 7,500 gallons of the MCHM/PPH product that is stored at the Poca site. It is estimated that this shipment will empty a single-walled Baker tank. The facility is moving to ensure that all MCHM at the Poca facility is stored in double-walled tanks.

An additional 350,000 gallon capacity tank has been cleaned and is on stand-by as a water storage tank. Two additional 350,000 gallon capacity tanks are also empty, and scheduled to be cleaned and prepared for water storage, if necessary.

The facility estimates that removal of the two 350,000 gallon tanks at the northern end of the facility will occur during the week of March 10, 2014. The facility is near completion of a draft demolition plan. WVDEP requested that the plan contain contingency measures to address any contamination that may be discovered beneath that tanks during their decommission, and that the priority is to prevent any release of the materials into the river.

The facility estimated that approximately 325,000 gallons of potential MCHM-contaminated water that has been collected during pumping operations in the trench and sumps is stored in on site tanks.

The facility received approval to ship the water stored at the Poca site to Waste Management in Hurricane, WV. The water will treated by solidification. Shipment of this water is expected to begin tomorrow.

The facility's consultant reports that they will continue to collect samples from the trench area on a weekly basis to investigate any trends of MCHM concentrations in the water. The data will be reviewed to determine if flushing activity is decreasing the MCHM concentration in the water, over time. They are also planning to collect water from a seep that is off site, across Barlow Road. They are collecting a sample from the seep in an attempt to investigate the presence of PPH, as recent data from the monitoring wells had hits for PPH but not MCHM.